LISA J. DAMIANI (CSB#137968)
DAMIANI LAW GROUP APC
701 B Street, Suite 1110
San Diego, California 92101
Tel. (619) 239-0170
Fax. (619) 239-0216
ljdamiani@damianilawgroup.com

Attorneys for Defendant,
BETTINA THAKORE (4)

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

(HONORABLE BARRY T. MOSKOWITZ)

UNITED STATES OF AMERICA, Plaintiff, v. PETER CARLO MERTENS, et al. Defendants.	Criminal Case No. 08CR0440-BTM NOTICE OF MOTION AND MOTION TO JOIN MOTIONS OF CO-DEFENDANT WAYNE JOSEPH FERNANDES (1) FOR 60-DAY CONTINUANCE; (2) TO COMPEL FURTHER DISCOVERY; AND, (3) FOR LEAVE TO FILE FURTHER SEVERANCE MOTION AND OTHER MOTIONS, IF NECESSARY Date: September 19, 2008 Time: 2:00 p.m.

TO KAREN P. HEWITT, UNITED STATES ATTORNEY, AND SHERRI WALKER HOBSON, ASSISTANT UNITED STATES ATTORNEY:

PLEASE TAKE NOTICE that on September 19, 2008, at 2:00 p.m., or as soon thereafter as counsel may be heard, Defendant BETTINA THAKORE (4), by and through her attorney of record, Lisa J. Damiani of the Damiani law Group APC, will move this court for an order joining Defendant WAYNE JOSEPH FERNANDES's Motions for 60-day Continuance, to Compel Further Discovery; and, for Leave to File Further Severance Motion and Other Motions, If Necessary, filed with this court on September 5, 2008. At that time, she will join in Mr. Fernandes's request for an order continuing the instant hearing, compelling further discovery and granting leave to file further pretrial motions.

MOTION TO JOIN

Defendant BETTINA THAKORE (4), by and through her attorney of record, Lisa J. Damiani of the Damiani law Group APC, hereby moves this court for an order joining Defendant WAYNE JOSEPH FERNANDES's Motions for 60-day Continuance, to Compel Further Discovery; and, for Leave to File Further Severance Motion and Other Motions, If Necessary, filed with this court on September 5, 2008. As of the filing of this motion, counsel for Ms. Thakore believes that she has not received all relevant and necessary discovery in this matter. She has made many unsuccessful attempts to retrieve all the discovery. As such, she respectfully joins in Mr. Fernandes's motions.

Dated: September 5, 2008

Respectfully submitted,

DAMIANI LAW GROUP APC

By: /s/Lisa J. Damiani
Lisa J. Damiani
Attorney for Defendant,
BETTINA THAKORE (4)